

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: CASE NO. 18-16416
Excell Brown, Jr.; CHAPTER 13
Debtor(s). JUDGE Jacqueline P. Cox

NOTICE OF MOTION

PLEASE TAKE NOTICE that on September 23, 2019 at 9:00 am, or soon thereafter as counsel may be heard, I shall appear before the Honorable Jacqueline P. Cox or any judge sitting in his/her stead, in the courtroom usually occupied by him/her in Room 680 at 219 South Dearborn Street, Chicago, IL 60604, and move to present the attached motion.

/s/ Nisha B. Parikh
Attorney for Creditor

NOTE: This law firm is deemed to be a debt collector.

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2019 a true and correct copy of the foregoing NOTICE OF MOTION was served:

Via the Court's ECF system on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

David M Siegel, Debtor's Counsel
Tom Vaughn, Trustee
Patrick S Layng, U.S. Trustee

And by regular US Mail, postage pre-paid on:

Excell Brown, Jr., 7518 S. Ridgeland, Chicago, IL 60649
Marva Brown-Jackson, 7606 S Paxton Ave, Chicago, IL 60649
William Jackson, 7518 South Ridgeland Avenue, Chicago, Illinois 60649

/s/ Veronica Gerardo

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:	CASE NO. 18-16416
Excell Brown, Jr.;	CHAPTER 13
Debtor(s).	JUDGE Jacqueline P. Cox

MOTION FOR AMENDED AGREED ORDER

Now comes Specialized Loan Servicing, LLC, secured creditor herein, by and through its attorneys, ANSELMO LINDBERG & ASSOCIATES LLC, and moves to amend the Agreed Order Conditioning the Stay & Co-Debtor Stay entered August 14, 2019 as docket #49, and in support thereof respectfully states as follows

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and the general orders of the Northern District of Illinois.
2. Venue is fixed in this Court pursuant to 28 U.S.C. § 1409.
3. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G).
4. The debtor filed a petition for relief under Chapter 13 on June 8, 2018. The Chapter 13 Plan was confirmed on October 22, 2018.
5. Specialized Loan Servicing, LLC holds a mortgage secured by a lien on debtor's real estate commonly known as 7518 South Ridgeland Avenue, Chicago, Illinois 60649.
6. That on June 25, 2019, Movant filed a Motion for Relief from the Automatic Stay and Relief from the Co-debtor Stay or, in the Alternative, to Dismiss the Case, alleging a post-petition default in monthly payments.
7. On August 13, 2018, an Agreed Order Conditioning the Automatic Stay and Co-debtor Stay was signed by this Honorable Court and entered as Docket #49.

8. Due to an oversight, the Order incorrectly listed when stipulated payments were to begin.

WHEREFORE, Movant prays for this Court to replace the Agreed Order entered on August 14, 2019 as Docket #49 with the attached proposed Agreed Order.

Specialized Loan Servicing, LLC

/s/ Nisha B. Parikh

Anselmo Lindberg & Associates
1771 W. Diehl Rd., Ste. 120
Naperville, IL 60563-4947
630-453-6960 | 866-402-8661 | 630-428-4620 (fax)
bankruptcy@AnselmoLindberg.com
Firm File Number: B19060037

This law firm is deemed to be a debt collector.